

NEELEMEN LAW GROUP
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The Honorable Marc Barreca
Location: Seattle
Hearing Date: July 8, 2015

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

In re: : Case No.: 15-11968
MARY JANE PENMAN, : RESPONSE TO TRUSTEE'S MOTION TO
Debtor(s). : DISMISS
:

COMES NOW the debtor, Mary Jane Penman, (hereinafter referred to as "Debtors"), by and through the law firm of NEELEMAN LAW GROUP, her Attorneys of Record, and pursuant to all applicable portions of United States Bankruptcy Code (U.S.C. Title 11) hereby responds to the Trustee's motion to dismiss. The debtor bases this on the following:

1. An agreed order was entered on June 10, 2015 which required the debtor to file a plan by June 19, 2015 and set for hearing on July 22, 2015.
2. The debtor filed the plan and the hearing on the approval of the amended plan is set for July 22, 2015.
3. The debtor requests the Trustee's motion to dismiss be continued to July 22, 2015.
4. The debtor asserts that, absent objection to the plan, this case is ready to be confirmed.

Response to Motion to Dismiss

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2 WHEREFORE, the debtor requests this court to continue the Trustee's motion to dismiss
3 to July 22, 2015.

4 DATED this 1st day of July, 2015

5 NEELEMAN LAW GROUP

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7 By: /s/ Thomas D. Neeleman
8 Thomas D. Neeleman, WSBA # 33980
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12 MAILING CERTIFICATE

13 I hereby certify that on this 1st day of July, 2015 a copy of this response was sent via
14 ECF to Chapter 13 Trustee.
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16 /s/ Emilee Morzelewski
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